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11 Attorneys for Plaintiffs and the Putative Class

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

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19 IN RE: FACEBOOK PRIVACY LITIGATION
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Case No. 10-cv-02389-JW

CLASS ACTION

STIPULATION AND
[PROPOSED] ORDER
CONTINUING CASE
MANAGEMENT CONFERENCE
TO OCTOBER 4, 2010

ACTION FILED: 05/28/10

JURY TRIAL DEMANDED

24 This Stipulation is entered into by and among plaintiffs David Gould and Mike Robertson
25 (collectively, "Plaintiffs") and defendant Facebook, Inc. ("Defendant") by and through their
26 respective counsel.

27 WHEREAS the initial case management conference is scheduled for September 27, 2010
28 at 10:00 a.m.;

WHEREAS Attorney Michael J. Aschenbrener will be out of the country on that date and therefore unavailable to attend the case management conference;

WHEREAS the parties have agreed to continue the case management conference until October 4, 2010 so that Attorney Aschenbrener will be able to attend.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiffs and Defendant, as follows:

1. The initial case management conference in this action shall be continued to October 4, 2010 at 10:00 a.m.; and

2. On or before September 24, 2010, the parties shall file a Joint Case Management Statement pursuant to Fed. R. Civ. P. 26 and Civ. L.R. 16-9. The statement shall include, among other things, a good faith discovery plan with a proposed date for close of all discovery. The parties shall also address whether discovery should be bifurcated between class and merits.

Respectfully submitted,

Dated: September 8, 2010

NASSIRI & JUNG LLP

By: /s/ Kassra P. Nassiri
Kassra P. Nassiri
Attorneys for Plaintiff Mike Robertson

Dated: September 8, 2010

EDELSON MCGUIRE LLC

By: /s/ Michael J. Aschenbrener
Michael J. Aschenbrener (*pro hac vice*)
Attorneys for Plaintiff David Gould

Dated: September 8, 2010

COOLEY LLP

By: /s/ Matthew D. Brown
Matthew D. Brown
Attorneys for Defendant Facebook, Inc.

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

DATED: September 9, 2010



HON. JAMES WARE

UNITED STATES DISTRICT JUDGE

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation and [Proposed] Order Continuing Case Management Conference to October 4, 2010.

Dated: September 8, 2010

NASSIRI & JUNG LLP

By: _____/s/ Kassra P. Nassiri_____
Kassra P. Nassiri